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BEFORE THE POSTAL RATE COMMISSION HAR 29 WASHINGTON, D.C. 20268-0001

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF UNITED STATES POSTAL SERVICE
FOR LATE ACCEPTANCE OF
OBJECTIONS TO UPS INTERROGATORIES UPS/USPS-T34-28 and 29(b)
TO WITNESS ROBINSON
(March 29, 2000)

The United States Postal Service hereby requests leave to file two days late objections to interrogatories UPS/USPS-T34-28 and 29(b), filed on March 17, 2000. Due to the volume of incoming discovery requests, and the amount of time needed to locate potentially responsive documents, it was not possible to formulate objections to these questions until today. The Postal Service has emailed the objections to counsel for UPS, and does not believe that the short, yet unavoidable delay, will work to the unfair advantage of any party.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Richard T. Cooper

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993; Fax –5402 March 29, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Richard T. Coopei

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2993; Fax –5402 March 29, 2000